

UNITED STATES DISTRICT COURT
for the
EASTERN DISTRICT OF WISCONSIN

STATE FARM MUTUAL)
AUTOMOBILE INSURANCE COMPANY)
)
Plaintiff)
)
v.) Civil Action No.
)
UNITED STATES OF AMERICA)
BRADLEY STROHBUSCH)
)
Defendants

COMPLAINT

1. Plaintiff is corporation incorporated under the laws of Illinois and having a main office located at One State Farm Plaza, Bloomington, Illinois 61701.
2. Defendant, United States of America, is the governmental body under which the United States Postal Service is organized and pursuant to the Federal Tort Claims Act is the proper defendant in this action.
3. Defendant, Bradley Strohbusch, is a resident of the State of Wisconsin residing at 25 McMillen St., Fort Atkinson, WI 53538-1947.
4. This action arises under the Federal Tort Claims Act, 28 U.S.C. §2674 and jurisdiction is proper under 28 U.S.C. §1346.
5. Upon information and belief, at all times material, Mr. Strohbusch was acting in the scope of his employment with the United States Postal Service but is named personally in the event that the United States of America contests that he was in the scope and course of his employment at the time of the incident described below.
6. On February 20, 2016, Plaintiff's insured driver, Lawrence Jacob, was lawfully

driving near the intersection of County P and Linden Drive in the Town of Whitewater in Walworth County.

7. At the same time and place, the defendant, Bradley Strohbusch, negligently operated a motor vehicle by, *inter alia*, failing to keep a proper lookout when attempting to execute a left turn.

8. As a proximate result of Mr. Strohbusch's negligence, the vehicle owned by and driven by Plaintiff's insured, Lawrence Jacob, sustained damage.

9. Pursuant to its insurance policy, Plaintiff reasonably and necessarily paid to, or on behalf of, its insured the sum of \$9,594.02 for property damage claims.

10. Pursuant to its insurance policy and the laws of Wisconsin, Plaintiff is subrogated to the rights of its insured against the defendants.

11. Plaintiff has caused to be served a timely administrative claim upon the United States Post Service and that claim has been denied.

WHEREFORE, plaintiff demands:

Money Damages in the amount of \$9,594.02 plus costs.

Any further relief which the court may deem appropriate.

/s/ *Charles W. Kramer*

Date: May 2, 2017

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